

Federal Defenders
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February 26, 2025

BY ECF

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Virginia Lemus Recinos
23 Cr. 464 (AS)**

Dear Judge Subramanian:

I write on behalf of both parties to request an adjournment of the conference scheduled for tomorrow, February 27, 2025. The parties have conferred regarding a motion and trial schedule, and propose the following schedule:

Defense motions:	Friday, May 2, 2025
Government response:	Friday, May 23, 2025
Defense reply:	Friday, May 30, 2025
Trial:	Monday, July 14, 2025

The parties defer to the Court as to whether to reschedule the status conference, schedule a motion hearing, or simply schedule a pretrial conference.

Finally, the government seeks, and the defense consents to, the exclusion of time under the Speedy Trial Act until the date of trial.

Respectfully submitted,

/s/

Hannah McCrea
Assistant Federal Defender
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CC: AUSA Katherine Cheng

The parties' proposed schedule is hereby adopted, and today's conference is hereby adjourned to Friday, June 13, 2025 at 2:00 PM in Courtroom 15A, 500 Pearl Street, New York, NY 10007, when the Court will hear argument on the defense's motions. It is further ordered that the time between February 27, 2025 and June 13, 2025 be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will permit the parties the time necessary for effective trial preparation. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 45.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: February 27, 2025